

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

RYOAUKE KONDO, SANTOS ACOSTA,
KRISTOPHER FARLEY, EDWARD DEL
VECHHIO, JORGE CIFUENTES, CELINA
LI, AND HANNA PAGE, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CREATIVE SERVICES, INC.,

Defendant.

Civil Action No. 1:22-cv-10438-DJC
Honorable Judge Denise J. Casper

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, the Declaration of David K. Lietz in Support of Plaintiffs' Unopposed Motion for Preliminary Approval and its exhibits thereto, and all prior pleadings and proceedings had herein, Plaintiffs Ryosuke Kondo, Jorge Cifuentes, Daniel Durgin, Santos Acosta, Kristopher Farley, Edward Del Vecchio, Valerie Locke, Michael Mercurio, Celina Li, Hannah Page, Pasquale Russolillo, Lisa McGillivray, and Gary Shepis, individually and on behalf of the putative class, (collectively, "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 23 for and Order: (1) granting preliminary approval of the proposed Settlement; (2) preliminarily certifying a class for purposes of Settlement; (3) appointing Plaintiffs as Class Representatives; (4) appointing David K. Lietz as Class Counsel; (5) approving

the Parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (6) directing that notice be given to the Settlement Class; (7) scheduling a hearing at which time the Court will consider the request for final approval of the Settlement and request for attorneys' fees, expenses, and service awards to Plaintiffs; and (8) granting such other relief and further relief as the Court deems just and proper.

Dated: March 24, 2023

Respectfully submitted,

s/ David K. Lietz

David K. Lietz (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ David K. Lietz
David K. Lietz